

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

CECILIA DEVERA CURAMENG, R.N.
27291 Glenmeadows Drive
Lake Forest, CA 92630

Registered Nurse License No. 542506

Respondent.

Case No. 2007-239

OAH No. L-2007070315

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on December 19, 2007.

It is so ORDERED November 19, 2007.



FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 JAMES LEDAKIS
Supervising Deputy Attorney General
3 SUSAN FITZGERALD, State Bar No. 112278
Deputy Attorney General
4 California Department of Justice
110 West "A" Street, Suite 1100
5 San Diego, CA 92101
6 P.O. Box 85266
San Diego, CA 92186-5266
7 Telephone: (619) 645-2066
Facsimile: (619) 645-2061
8

9 Attorneys for Complainant

10 **BEFORE THE**
BOARD OF REGISTERED NURSING
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

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13 In the Matter of the Accusation Against:

14 CECILIA DEVERA CURAMENG, R.N.
27291 Glenmeadows Drive
15 Lake Forest, CA 92630

16 Registered Nurse License No. 542506

17 Respondent.

Case No. 2007-239

OAH No. L-2007070315

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of the
22 Board of Registered Nursing. She brought this action solely in her official capacity and is
23 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
24 by Susan Fitzgerald, Deputy Attorney General.

25 2. Cecilia Devera Curameng, R.N. (Respondent) is representing herself in this
26 proceeding and has chosen not to exercise her right to be represented by counsel.

27 3. On or about April 1, 1998, the Board of Registered Nursing issued Registered
28 Nurse License No. 542506 to Cecilia Devera Curameng, R.N. (Respondent). The license was in

1 full force and effect at all times relevant to the charges brought in Accusation No. 2007-239 and
2 will expire on April 30, 2008, unless renewed.

3 JURISDICTION

4 4. Accusation No. 2007-239 was filed before the Board of Registered Nursing
5 (Board), Department of Consumer Affairs, and is currently pending against Respondent. A true
6 and correct copy of the Accusation and all other statutorily required documents were properly
7 served on Respondent on April 3, 2007. Respondent timely filed her Notice of Defense
8 contesting the Accusation. A true and correct copy of Accusation No. 2007-239 is attached as
9 exhibit A and incorporated herein by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read and understands the charges and allegations in
12 Accusation No. 2007-239. Respondent has also carefully read and fully understands the effects
13 of this Stipulated Settlement and Disciplinary Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
16 her own expense; the right to confront and cross-examine the witnesses against her; the right to
17 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
18 compel the attendance of witnesses and the production of documents; the right to reconsideration
19 and court review of an adverse decision; and all other rights accorded by the California
20 Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each
22 and every right set forth above.

23 CULPABILITY

24 8. Respondent admits the truth of each charge and allegation in Accusation No.
25 2007-239 related to the Second and Third Causes for Discipline. Regarding the First Cause for
26 Discipline, Respondent neither admits nor denies the allegations and charge; however, she
27 acknowledged that were the case to go to hearing, Complainant could establish a *prima facie*

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1 case. Respondent chooses not to contest the allegations and charge in the First Cause for
2 Discipline.

3 9. Respondent agrees that her registered nurse license is subject to discipline and she
4 agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order
5 below.

6 **CIRCUMSTANCES IN MITIGATION**

7 10. Respondent Cecilia Devera Curameng, R.N. has never been the subject of any
8 disciplinary action. She is admitting responsibility at an early stage in the proceedings.

9 **RESERVATION**

10 11. The admissions made by Respondent herein are only for the purposes of this
11 proceeding, or any other proceedings in which the Board of Registered Nursing or other
12 professional licensing agency is involved, and shall not be admissible in any other criminal or
13 civil proceeding.

14 **CONTINGENCY**

15 12. This stipulation shall be subject to approval by the Board of Registered Nursing.
16 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
17 Registered Nursing may communicate directly with the Board regarding this stipulation and
18 settlement, without notice to or participation by Respondent. By signing the stipulation,
19 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind
20 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
21 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall
22 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
23 between the parties, and the Board shall not be disqualified from further action by having
24 considered this matter.

25 **OTHER MATTERS**

26 13. In consideration for the above stipulations and waivers, Complainant agrees to
27 cost recovery in the amount of \$4,598.25.

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14. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

DISCIPLINARY ORDER

In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or opportunity to be heard by respondent, issue and enter the following Disciplinary Order:

IT IS HEREBY ORDERED that Registered Nurse License No. 542506 issued to Respondent Cecilia Devera Curameng, R.N. is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions:

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. **Comply with the Board's Probation Program.** Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no

1 more than 15 days of any address change and shall at all times maintain an active, current license
2 status with the Board, including during any period of suspension.

3 Upon successful completion of probation, Respondent's license shall be fully restored.

4 3. **Report in Person.** Respondent, during the period of probation, shall appear in
5 person at interviews/meetings as directed by the Board or its designated representatives.

6 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or
7 practice as a registered nurse outside of California shall not apply toward a reduction of this
8 probation time period. Respondent's probation is tolled, if and when she resides outside of
9 California. Respondent must provide written notice to the Board within 15 days of any change of
10 residency or practice outside the state, and within 30 days prior to re-establishing residency or
11 returning to practice in this state.

12 Respondent shall provide a list of all states and territories where she has ever been
13 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
14 provide information regarding the status of each license and any changes in such license status
15 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
16 new nursing license during the term of probation.

17 5. **Submit Written Reports.** Respondent, during the period of probation, shall
18 submit or cause to be submitted such written reports/declarations and verification of actions
19 under penalty of perjury, as required by the Board. These reports/declarations shall contain
20 statements relative to Respondent's compliance with all the conditions of the Board's Probation
21 Program. Respondent shall immediately execute all release of information forms as may be
22 required by the Board or its representatives.

23 Respondent shall provide a copy of this Decision to the nursing regulatory agency in
24 every state and territory in which she has a registered nurse license.

25 6. **Function as a Registered Nurse.** Respondent, during the period of probation,
26 shall engage in the practice of registered nursing in California for a minimum of 24 hours per
27 week for 6 consecutive months or as determined by the Board.

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1 For purposes of compliance with the section, "engage in the practice of registered
2 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
3 work in any non-direct patient care position that requires licensure as a registered nurse.

4 The Board may require that advanced practice nurses engage in advanced practice nursing
5 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

6 If Respondent has not complied with this condition during the probationary term, and
7 Respondent has presented sufficient documentation of her good faith efforts to comply with this
8 condition, and if no other conditions have been violated, the Board, in its discretion, may grant
9 an extension of Respondent's probation period up to one year without further hearing in order to
10 comply with this condition. During the one year extension, all original conditions of probation
11 shall apply.

12 **7. Employment Approval and Reporting Requirements.** Respondent shall obtain
13 prior approval from the Board before commencing or continuing any employment, paid or
14 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
15 performance evaluations and other employment related reports as a registered nurse upon request
16 of the Board.

17 Respondent shall provide a copy of this Decision to her employer and immediate
18 supervisors prior to commencement of any nursing or other health care related employment.

19 In addition to the above, Respondent shall notify the Board in writing within seventy-two
20 (72) hours after she obtains any nursing or other health care related employment. Respondent
21 shall notify the Board in writing within seventy-two (72) hours after she is terminated or
22 separated, regardless of cause, from any nursing, or other health care related employment with a
23 full explanation of the circumstances surrounding the termination or separation.

24 **8. Supervision.** Respondent shall obtain prior approval from the Board regarding
25 Respondent's level of supervision and/or collaboration before commencing or continuing any
26 employment as a registered nurse, or education and training that includes patient care.

27 Respondent shall practice only under the direct supervision of a registered nurse in good
28 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods

1 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
2 approved.

3 Respondent's level of supervision and/or collaboration may include, but is not limited to
4 the following:

5 (a) Maximum - The individual providing supervision and/or collaboration is present in
6 the patient care area or in any other work setting at all times.

7 (b) Moderate - The individual providing supervision and/or collaboration is in the
8 patient care unit or in any other work setting at least half the hours Respondent works.

9 (c) Minimum - The individual providing supervision and/or collaboration has person-
10 to-person communication with Respondent at least twice during each shift worked.

11 (d) Home Health Care - If Respondent is approved to work in the home health care
12 setting, the individual providing supervision and/or collaboration shall have person-to-person
13 communication with Respondent as required by the Board each work day. Respondent shall
14 maintain telephone or other telecommunication contact with the individual providing supervision
15 and/or collaboration as required by the Board during each work day. The individual providing
16 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits
17 to patients' homes visited by Respondent with or without Respondent present.

18 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in
19 any private duty position as a registered nurse, a temporary nurse placement agency, a traveling
20 nurse, or for an in-house nursing pool.

21 Respondent shall not work for a licensed home health agency as a visiting nurse unless
22 the registered nursing supervision and other protections for home visits have been approved by
23 the Board. Respondent shall not work in any other registered nursing occupation where home
24 visits are required.

25 Respondent shall not work in any health care setting as a supervisor of registered nurses.
26 The Board may additionally restrict Respondent from supervising licensed vocational nurses
27 and/or unlicensed assistive personnel on a case-by-case basis.

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1 Respondent shall not work as a faculty member in an approved school of nursing or as an
2 instructor in a Board approved continuing education program.

3 Respondent shall work only on a regularly assigned, identified and predetermined
4 worksite(s) and shall not work in a float capacity.

5 If Respondent is working or intends to work in excess of 40 hours per week, the Board
6 may request documentation to determine whether there should be restrictions on the hours of
7 work.

8 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll
9 and successfully complete a course(s) relevant to the practice of registered nursing no later than
10 six months prior to the end of her probationary term.

11 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
12 Respondent shall submit to the Board the original transcripts or certificates of completion for the
13 above required course(s). The Board shall return the original documents to Respondent after
14 photocopying them for its records.

15 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with its
16 investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
17 amount of \$4,598.25. Respondent shall be permitted to pay these costs in a payment plan
18 approved by the Board, with payments to be completed no later than three months before the end
19 of the probation term.

20 If Respondent has not complied with this condition during the probationary term, and
21 Respondent has presented sufficient documentation of her good faith efforts to comply with this
22 condition, and if no other conditions have been violated, the Board, in its discretion, may grant
23 an extension of Respondent's probation period up to one year without further hearing in order to
24 comply with this condition. During the one year extension, all original conditions of probation
25 will apply.

26 12. **Violation of Probation.** If Respondent violates the conditions of her probation,
27 the Board after giving Respondent notice and an opportunity to be heard, may set aside the stay
28 order and impose the stayed discipline (revocation/suspension) of Respondent's license.

1 If during the period of probation, an accusation or petition to revoke probation has been
2 filed against Respondent's license or the Attorney General's Office has been requested to prepare
3 an accusation or petition to revoke probation against Respondent's license, the probationary
4 ~~period shall automatically be extended and shall not expire until the accusation or petition has~~
5 been acted upon by the Board.

6 13. **License Surrender.** During Respondent's term of probation, if she ceases
7 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
8 probation, Respondent may surrender her license to the Board. The Board reserves the right to
9 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
10 take any other action deemed appropriate and reasonable under the circumstances, without
11 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
12 will no longer be subject to the conditions of probation.

13 Surrender of Respondent's license shall be considered a disciplinary action and shall
14 become a part of Respondent's license history with the Board. A registered nurse whose license
15 has been surrendered may petition the Board for reinstatement no sooner than the following
16 minimum periods from the effective date of the disciplinary decision:

17 (1) Two years for reinstatement of a license that was surrendered for any reason other
18 than a mental or physical illness; or

19 (2) One year for a license surrendered for a mental or physical illness.

20 **ACCEPTANCE**

21 I have carefully read the Stipulated Settlement and Disciplinary Order. I
22 understand the stipulation and the effect it will have on my Registered Nurse License. I enter
23 into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently,
24 and agree to be bound by the Decision and Order of the Board of Registered Nursing.

25 DATED: September 17, 2007

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27 Cecilia V. Curameng R.N.
28 CECILIA DEVERA CURAMENG R.N.
Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: Sept. 19, 2007

EDMUND G. BROWN JR., Attorney General
of the State of California

LINDA SCHNEIDER
Supervising Deputy Attorney General


SUSAN FITZGERALD
Deputy Attorney General

Attorneys for Complainant

Exhibit A
Accusation No. 2007-239

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 MARGARET LAFKO,
Supervising Deputy Attorney General
3 SUSAN FITZGERALD, State Bar No. 112278
Deputy Attorney General
4 California Department of Justice
110 West "A" Street, Suite 1100
5 San Diego, CA 92101

6 P.O. Box 85266
San Diego, CA 92186-5266
7 Telephone: (619) 645-2066
Facsimile: (619) 645-2061

8 Attorneys for Complainant
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10 **BEFORE THE**
11 **BOARD OF REGISTERED NURSING**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

13 In the Matter of the Accusation Against:

Case No. 2007-239

14 **CECILIA DEVERA CURAMENG**
27291 Glenmeadows Dr
15 Lake Forest, CA 92630

ACCUSATION

16 Registered Nurse License No. 542506,

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation solely in
21 her official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about April 1, 1998, the Board of Registered Nursing ("Board") issued
24 Registered Nurse License Number 542506 to Cecilia Devera Curameng ("Respondent"). The
25 license will expire on April 30, 2008, unless renewed.

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JURISDICTION

3. Section 2750 of the Business and Professions Code ("Code") provides:

Every certificate holder or licensee, including licensees holding temporary licenses, or licensees holding licenses placed in an inactive status, may be disciplined as provided in this article [Article 3 of the Nursing Practice Act (Bus. & Prof Code, § 2700 et seq.)]. As used in this article, 'license' includes certificate, registration, or any other authorization to engage in practice regulated by this chapter. The proceedings under this article shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code [the Administrative Procedure Act], and the board shall have all the powers granted therein.

STATUTORY PROVISIONS

4. Code section 2761, subdivision (a)(1), provides:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(1) Incompetence, or gross negligence in carrying out usual certified or licensed nursing functions.

5. Code section 2762, subdivision (e), provides, in pertinent part:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any hospital, patient, or other record pertaining to the substances described in subdivision (a) of this section."

6. Code section 4022 provides:

'Dangerous drug' or 'dangerous device' means any drug or device unsafe for self-use in humans or animals, and includes the following:

(a) Any drug that bears the legend: 'Caution: federal law prohibits dispensing without prescription,' 'Rx only,' or words of similar import.

(b) Any device that bears the statement: 'Caution:

1 federal law restricts this device to sale by or on the order of a
2 _____, 'Rx only,' or words of similar import, the blank
3 to be filled in with the designation of the practitioner licensed
4 to use or order use of the device.

5 (c) Any other drug or device that by federal or state law can be
6 lawfully dispensed only on prescription or furnished pursuant to
7 Section 4006."

8 7. Code section 125.3 provides that the Board may request the administrative law
9 judge to direct a licensee found to have committed a violation or violations of the licensing act
10 to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
11 the case.

12 DRUGS

13 8. Coumadin (Warfarin) is a dangerous drug within the meaning of
14 Code section 4022, in that under federal or state law it can only be lawfully dispensed on
15 prescription or furnished pursuant to Section 4006.

16 REGULATORY PROVISIONS

17 9. California Code of Regulations, title 16, section 1442, provides:

18 As used in Section 2761 of the code, 'gross negligence'
19 includes an extreme departure from the standard of care which,
20 under similar circumstances, would have ordinarily been exercised
21 by a competent registered nurse. Such an extreme departure means
22 the repeated failure to provide nursing care as required or failure to
23 provide care or to exercise ordinary precaution in a single situation
24 which the nurse knew, or should have known, could have
25 jeopardized the client's health or life.

26 10. California Code of Regulations, title 16, section 1443, provides:

27 As used in Section 2761 of the code, 'incompetence'
28 means the lack of possession of or the failure to exercise that
degree of learning, skill, care and experience ordinarily possessed
and exercised by a competent registered nurse as described in
Section 1443.5.

11. California Code of Regulations, title 16, section 1443.5, provides:

A registered nurse shall be considered to be competent
when he/she consistently demonstrates the ability to transfer
scientific knowledge from social, biological and physical
sciences in applying the nursing process, as follows:

1 (1) Formulates a nursing diagnosis through observation
2 of the client's physical condition and behavior, and through
3 interpretation of information obtained from the client and
4 others, including the health team.

5 (2) Formulates a care plan, in collaboration with the client, which
6 ensures that direct and indirect nursing care services provide for
7 the client's safety, comfort, hygiene, and protection, and for disease
8 prevention and restorative measures.

9 (3) Performs skills essential to the kind of nursing action to be
10 taken, explains the health treatment to the client and family and
11 teaches the client and family how to care for the client's
12 health needs.

13 (4) Delegates tasks to subordinates based on the legal scopes of
14 practice of the subordinates and on the preparation and capability
15 needed in the tasks to be delegated, and effectively supervises
16 nursing care being given by subordinates.

17 (5) Evaluates the effectiveness of the care plan through
18 observation of the client's physical condition and behavior, signs
19 and symptoms of illness, and reactions to treatment and through
20 communication with the client and health team members, and
21 modifies the plan as needed.

22 (6) Acts as the client's advocate, as circumstances require, by
23 initiating action to improve health care or to change decisions or
24 activities which are against the interests or wishes of the client, and
25 by giving the client the opportunity to make informed decisions
26 about health care before it is provided.

27 CHARGES AND ALLEGATIONS

28 First Cause for Discipline

(Gross Negligence)

12. Respondent's license is subject to discipline for unprofessional conduct under
Code section 2761, subdivision (a)(1) in conjunction with CCR §1142 in that, on or about
October 2, 2004, while employed at and on duty as a registered nurse at Fountain Valley
Regional Hospital (Fountain Valley), located in Fountain Valley, California Respondent
committed acts of gross negligence as follows:

While providing care for Patient #010455095, a 75 year-old patient who had recently
undergone a "thoracentesis procedure," Respondent failed to take vital signs every 15 minutes

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1 and failed to assess the patient's lung function. She also did not comply with the established
2 Fountain Valley guidelines for the care of a post-thoracentesis procedure patient.

3 **SECOND CAUSE FOR DISCIPLINE**

4 **(Incompetence)**

5 13. Respondent's license is subject to discipline for unprofessional conduct under
6 Code section 2761, subdivision (a)(1) in conjunction with CCR § 1443 in that, on or about
7 October 15, 2004, while employed at and on duty as a registered nurse at Fountain Valley,
8 Respondent committed an act of incompetence as follows:

9 At approximately 1730 hours, Respondent administered a 4 mg. dose of Coumadin
10 (Warfarin) to Patient #010564817 when, in fact, she should have administered only a 1 mg. dose.
11 Respondent admitted that she did not see the change in dosage (at 1600 hours) until after she
12 administered the 4 mg. two hours later. Additionally, Respondent made false and/or grossly
13 incorrect entries in the records concerning this, as more particularly alleged below.

14 **THIRD CAUSE FOR DISCIPLINE**

15 **(False, Grossly Incorrect, Grossly Inconsistent Record Entries)**

16 14. Respondent's license is subject to discipline for unprofessional conduct under
17 Code section 2762, subdivision (e) in that, on or about October 15, 2004, while employed at
18 Fountain Valley, Respondent made false, grossly incorrect, or grossly inconsistent entries in
19 hospital, patient, or other records pertaining to Coumadin (Warfarin) for Patient #010564817 in
20 that she falsely recorded the amount of Coumadin given the patient and crossed out a changed
21 documentation of medication dose that was given (re the Coumadin).

22 **PRAYER**

23 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein
24 alleged, and that following the hearing the Board issue a decision:


25 1. Revoking or suspending Registered Nurse License Number 542506,
26 issued to Cecilia Devera Curameng;

27 2. Ordering Cecilia Devera Curameng to pay the reasonable costs incurred by the
28 Board in the investigation and enforcement of this case pursuant to Code section 125.3; and,

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3. Taking such other and further action as deemed necessary and proper.

DATED: 8/26/07


RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

03579110-SD2006800790